

# **GHAJAR**

# **EXHIBIT 5**

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2 Cadio Zirpoli (State Bar No. 179108)  
3 Christopher K.L. Young (State Bar No. 318371)  
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15 **UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

16 Richard Kadrey, et al.,

17 *Individual and Representative Plaintiffs,*

18 v.

19 Meta Platforms, Inc.,

20 *Defendant.*

21 Lead Case No. 3:23-cv-03417-VC  
22 Case No. 4:23-cv-04663

23 **PLAINTIFF TA-NEHISI COATES'S  
24 RESPONSES TO DEFENDANT META  
25 PLATFORMS, INC.'S SECOND SET OF  
26 REQUESTS FOR ADMISSION**

1 “other than YOUR contention that LLM developers such as Meta should have compensated YOU to  
 2 allegedly use” as irrelevant and unintelligible. Plaintiff interprets this Request as asking whether  
 3 Plaintiff believed the only remedy for Meta’s conduct is actual damages. Plaintiff responds, deny.

4 **REQUEST FOR ADMISSION NO. 21:**

5 Admit that, other than YOUR contention that LLM developers such as Meta should have  
 6 compensated YOU to allegedly use YOUR ASSERTED WORKS to train large language models, YOU  
 7 are unaware of any documentary evidence demonstrating an injury that YOU have suffered due to the  
 8 infringement alleged in the COMPLAINT.

9 **RESPONSE TO REQUEST NO. 21:**

10 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
 11 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 12 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
 13 terms “You” and “Your” as referring to Plaintiff Ta-Nehisi Coates. Plaintiff objects to the phrase,  
 14 “other than YOUR contention that LLM developers such as Meta should have compensated YOU to  
 15 allegedly use” as irrelevant and unintelligible. Plaintiff responds, deny.

16 **REQUEST FOR ADMISSION NO. 22:**

17 Admit that YOU are personally unaware of any instance in which a PERSON read text  
 18 generated by any of Meta’s Llama models as a substitute for reading YOUR ASSERTED WORKS.

19 **RESPONSE TO REQUEST NO. 22:**

20 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
 21 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 22 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
 23 terms “You” and “Your” as referring to Plaintiff Ta-Nehisi Coates. Plaintiff further objects to the  
 24 phrase “you are personally unaware” as unintelligible. Plaintiff, in him individual capacity, responds,  
 25 admit.

26 **REQUEST FOR ADMISSION NO. 23:**

1 Admit that YOU are personally unaware of any documentary evidence demonstrating that any  
 2 PERSON has read text generated by any of Meta's Llama models as a substitute for reading YOUR  
 3 ASSERTED WORKS.

4 **RESPONSE TO REQUEST NO. 23:**

5 Plaintiff objects to the defined terms "You" and "Your" as vague and overbroad and calling for  
 6 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 7 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
 8 terms "You" and "Your" as referring to Plaintiff Ta-Nehisi Coates. Plaintiff also objects to the term  
 9 "documentary evidence" as being vague and overbroad because it is not limited to the specific claims  
 10 and defenses raised in this dispute. Plaintiff further objects to the phrase "you are personally unaware"  
 11 as unintelligible. Plaintiff, in him individual capacity, responds, admit.

12 **REQUEST FOR ADMISSION NO. 24:**

13 Admit that YOU are personally unaware of any text generated by any of Meta's Llama models  
 14 that infringes YOUR ASSERTED WORKS.

15 **RESPONSE TO REQUEST NO. 24:**

16 Plaintiff objects to the defined terms "You" and "Your" as vague and overbroad and calling for  
 17 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 18 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
 19 terms "You" and "Your" as referring to Plaintiff Ta-Nehisi Coates. Plaintiff objects to the phrase  
 20 "personally unaware" as unintelligible. Plaintiff, in him individual capacity, responds, admit.

21 **REQUEST FOR ADMISSION NO. 25:**

22 Admit that YOU have personally used one of Meta's Llama models.

23 **RESPONSE TO REQUEST NO. 25:**

24 Plaintiff objects to the defined terms "You" and "Your" as vague and overbroad and calling for  
 25 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 26 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the  
 27 phrase "YOU have personally used" as unintelligible. Plaintiff further objects to this Request as not

1 terms "You" and "Your" as referring to Plaintiff Ta-Nehisi Coates. Plaintiff further objects to the  
 2 phrase "for a fee" as vague and ambiguous. Subject to and without waiving the foregoing objections,  
 3 Plaintiff responds that after a reasonable inquiry, the information known or that can be readily obtained  
 4 by him is insufficient to enable him to admit or deny.

5 Dated: July 22, 2024

6 By: /s/ Bryan Clobes  
 7 Bryan L. Clobes

8 Bryan L. Clobes (pro hac vice)  
 9 Alexander J. Sweatman (pro hac vice)  
 10 Mohammed Rathur (pro hac vice)  
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 25 *and the Proposed Class*

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15 **UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

16 Richard Kadrey, et al.,

17 *Individual and Representative Plaintiffs,*

18 v.

19 Meta Platforms, Inc.,

20 *Defendant.*

21 Lead Case No. 3:23-cv-03417-VC  
22 Case No. 4:23-cv-04663

23 **PLAINTIFF JUNOT DIAZ'S RESPONSES  
TO DEFENDANT META PLATFORMS,  
INC.'S SECOND SET OF REQUESTS FOR  
ADMISSION**

1 YOUR contention that LLM developers such as Meta should have compensated YOU to allegedly use" 2 as irrelevant and unintelligible. Plaintiff interprets this Request as asking whether Plaintiff believed the 3 only remedy for Meta's conduct is actual damages. Plaintiff responds, deny.

4 **REQUEST FOR ADMISSION NO. 21:**

5 Admit that, other than YOUR contention that LLM developers such as Meta should have 6 compensated YOU to allegedly use YOUR ASSERTED WORKS to train large language models, YOU 7 are unaware of any documentary evidence demonstrating an injury that YOU have suffered due to the 8 infringement alleged in the COMPLAINT.

9 **RESPONSE TO REQUEST NO. 21:**

10 Plaintiff objects to the defined terms "You" and "Your" as vague and overbroad and calling for 11 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it 12 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the 13 terms "You" and "Your" as referring to Plaintiff Junot Diaz. Plaintiff objects to the phrase, "other than" 14 YOUR contention that LLM developers such as Meta should have compensated YOU to allegedly use" 15 as irrelevant and unintelligible. Plaintiff responds, deny.

16 **REQUEST FOR ADMISSION NO. 22:**

17 Admit that YOU are personally unaware of any instance in which a PERSON read text 18 generated by any of Meta's Llama models as a substitute for reading YOUR ASSERTED WORKS.

19 **RESPONSE TO REQUEST NO. 22:**

20 Plaintiff objects to the defined terms "You" and "Your" as vague and overbroad and calling for 21 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it 22 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the 23 terms "You" and "Your" as referring to Plaintiff Junot Diaz. Plaintiff further objects to the phrase "you 24 are personally unaware" as unintelligible. Plaintiff, in his individual capacity, responds, admit.

25 **REQUEST FOR ADMISSION NO. 23:**

26 Admit that YOU are personally unaware of any documentary evidence demonstrating that any 27 PERSON has read text generated by any of Meta's Llama models as a substitute for reading YOUR 28 ASSERTED WORKS.

**1 RESPONSE TO REQUEST NO. 23:**

2 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
 3 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 4 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
 5 terms “You” and “Your” as referring to Plaintiff Junot Diaz. Plaintiff also objects to the term  
 6 “documentary evidence” as being vague and overbroad because it is not limited to the specific claims  
 7 and defenses raised in this dispute. Plaintiff further objects to the phrase “you are personally unaware”  
 8 as unintelligible. Plaintiff, in him individual capacity, responds, admit.

**9 REQUEST FOR ADMISSION NO. 24:**

10 Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models  
 11 that infringes YOUR ASSERTED WORKS.

**12 RESPONSE TO REQUEST NO. 24:**

13 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
 14 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 15 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
 16 terms “You” and “Your” as referring to Plaintiff Junot Diaz. Plaintiff objects to the phrase “personally  
 17 unaware” as unintelligible. Plaintiff, in him individual capacity, responds, admit.

**18 REQUEST FOR ADMISSION NO. 25:**

19 Admit that YOU have personally used one of Meta’s Llama models.

**20 RESPONSE TO REQUEST NO. 25:**

21 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
 22 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 23 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the  
 24 phrase “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not  
 25 relevant to any claims or defenses in this dispute since this case concerns Meta’s large language  
 26 models. Plaintiff, in him individual capacity, responds, deny.

**27 REQUEST FOR ADMISSION NO. 26:**

28 Admit that YOU have personally used one of the ChatGPT large language models.

1 Dated: July 22, 2024

2 By: /s/ Bryan Clobes  
3 Bryan L. Clobes

4 Bryan L. Clobes (pro hac vice)  
5 Alexander J. Sweatman (pro hac vice)  
6 Mohammed Rathur (pro hac vice)  
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21 *and the Proposed Class*

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20 Attorneys for Plaintiff  
21 *Christopher Farnsworth and  
Representative Plaintiffs and the Proposed Class*

26 RICHARD KADREY, *et al.*

27 Individual and Representative  
Plaintiffs,

Case No. 3:23-cv-03417-VC

PLAINTIFF CHRISTOPHER  
FARNSWORTH'S RESPONSES TO  
DEFENDANT'S FIRST SET OF REQUESTS  
FOR ADMISSIONS

1  
2 v.  
3 META PLATFORMS, INC, a Delaware  
4 corporation,  
5 Defendant.  
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PROPOUNDING PARTY: DEFENDANT META PLATFORMS, INC.

RESPONDING PARTY: PLAINTIFF CHRISTOPHER FARNSWORTH

SET NO.: ONE

### INTRODUCTION

Plaintiff Christopher Farnsworth (“Plaintiff”) hereby serves his responses and objections to Defendant Meta Platforms, Inc.’s (“Defendant” or “Meta”) First Set of Requests for Admissions (the “Requests” or “RFAs”).

### GENERAL OBJECTIONS

1. Plaintiff generally objects to Defendant’s definitions and instructions to the extent they purport to require Plaintiff to respond in any way beyond what is required by the Federal and local rules.

2. Plaintiff objects to the Requests to the extent they seek information or materials that are protected from disclosure by attorney-client privilege, the work product doctrine, expert disclosure rules, or other applicable privileges and protections, including communications with Plaintiff’s attorneys regarding the Action.

3. Discovery in this matter is ongoing and Plaintiff reserves the right to amend, modify, or supplement these responses with subsequently discovered responsive information and to introduce and rely upon any such subsequently discovered information in this litigation.

1 duplicative in whole or in part of Request No. 12. Plaintiff also objects that Plaintiff's position  
 2 regarding other Request for Admission responses is not the proper subject of a Request for  
 3 Admission.

4 Subject to and without waiving these general and specific objections, Plaintiff does not  
 5 respond to this Request because by its own terms the Request is conditioned upon denying  
 6 Request No. 22 as described. Plaintiff did not deny Request No. 22 as described and directs  
 7 Defendant to his response to Response No. 22.

8 **REQUEST FOR ADMISSION NO. 24:**

9 Admit that YOU are personally unaware of any instance in which a PERSON read text  
 10 generated by any of Meta's Llama models as a substitute for reading YOUR ASSERTED  
 11 WORKS.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 24:**

13 Plaintiff objects that the term "substitute" is vague and ambiguous. Plaintiff further  
 14 objects to this Request as an improper subject of a Request for Admission.

15 Subject to and without waiving these general and specific objections, Plaintiff responds  
 16 that he will not admit or deny this Request, on the grounds that the information requested is not a  
 17 proper subject of a Request for Admission. If a response is deemed required, Plaintiff denies the  
 18 Request on this same basis. Plaintiff agrees to meet and confer on the appropriate vehicle for  
 19 discovering Plaintiffs' current knowledge or awareness.

20 **REQUEST FOR ADMISSION NO. 25:**

21 Admit that YOU are personally unaware of any documentary evidence demonstrating that  
 22 any PERSON has read text generated by any of Meta's Llama models as a substitute for reading  
 23 YOUR ASSERTED WORKS.

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 25:**

25 Plaintiff objects that the terms "documentary evidence" and "substitute" are vague and  
 26 ambiguous. Plaintiff further objects to this Request as an improper subject of a Request for  
 27 Admission.

28 Subject to and without waiving these general and specific objections, Plaintiff responds

1 that he will not admit or deny this Request, on the grounds that the information requested is not a  
 2 proper subject of a Request for Admission. If a response is deemed required, Plaintiff denies the  
 3 Request on this same basis. Plaintiff agrees to meet and confer on the appropriate vehicle for  
 4 discovering Plaintiffs' current knowledge or awareness.

5 **REQUEST FOR ADMISSION NO. 26:**

6 Admit that YOU are personally unaware of any text generated by any of Meta's Llama  
 7 models that infringes YOUR ASSERTED WORKS.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 26:**

9 Plaintiff objects that the term "personally unaware" is vague and ambiguous. Plaintiff  
 10 objects to the extent that responding to this Request requires adopting a legal conclusion. Plaintiff  
 11 further objects to this Request as an improper subject of a Request for Admission.

12 Subject to and without waiving these general and specific objections, Plaintiff responds  
 13 that he will not admit or deny this Request, on the grounds that the information requested is not a  
 14 proper subject of a Request for Admission. If a response is deemed required, Plaintiff denies the  
 15 Request on this same basis. Plaintiff agrees to meet and confer on the appropriate vehicle for  
 16 discovering Plaintiffs' current knowledge or awareness.

17 **REQUEST FOR ADMISSION NO. 27:**

18 Admit that YOU have personally used one of Meta's Llama models.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 27:**

20 Plaintiff objects that this Request is not relevant to any claims or defenses.

21 Subject to and without waiving these general and specific objections, Plaintiff denies  
 22 Request No. 27.

23 **REQUEST FOR ADMISSION NO. 28:**

24 Admit that YOU have personally used one of the ChatGPT large language models.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 28:**

26 Plaintiff objects that this Request is not relevant to any claims or defenses.

27 Subject to and without waiving these general and specific objections, Plaintiff admits  
 28 Request No. 28.

**REQUEST FOR ADMISSION NO. 81:**

Admit that you are not aware of any agreements to assign rights in or to YOUR ASSERTED WORK(S) that have not already been produced in this ACTION.

## **RESPONSE TO REQUEST FOR ADMISSION NO. 80:**

Plaintiff objects that the terms “any agreements” and “assign rights in or to” are vague and ambiguous. Plaintiff further objects to this Request as compound and ambiguous, because it includes the disjunctive phrase, “in or to.” “[R]equests for admissions should not contain ‘compound, conjunctive, or disjunctive … statements.’” *James v. Maguire Corr. Facility*, No. C 10-1795 SI PR, 2012 WL 3939343, at \*4 (N.D. Cal. Sept. 10, 2012) (quoting *U.S. ex rel. England v. Los Angeles County*, 235 F.R.D. 675, 684 (E.D. Cal. 2006)); see also *King v. Biter*, No. 115CV00414LJOSABPC, 2018 WL 339052, at \*6 (E.D. Cal. Jan. 9, 2018).

Subject to and without waiving these general and specific objections, Plaintiff admits discovery is ongoing. Plaintiff further admits that Plaintiff has produced non-privileged documents in Plaintiff's possession, custody, or control, responsive to Meta's requests for production regarding licensing agreements for Plaintiff's Asserted Works. Plaintiff otherwise denies this Request.

Dated: November 18, 2024 Respectfully submitted,

## LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

By: /s/ Rachel Geman  
Rachel Geman

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9 *Counsel for Individual and Representative  
 Plaintiffs and the Proposed Class*

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**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

18 Richard Kadrey, et al.,  
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 20 *Individual and Representative Plaintiffs,*  
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 22 v.  
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 24 Meta Platforms, Inc.,  
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 26  
 27 *Defendant.*  
 28

18 Lead Case No. 3:23-cv-03417-VC  
 19 Case No. 4:23-cv-06663

20  
**PLAINTIFF CHRISTOPHER GOLDEN'S  
 21 RESPONSES TO DEFENDANT META  
 22 PLATFORMS, INC.'S SECOND SET OF  
 23 REQUESTS FOR ADMISSION**

1 “other than YOUR contention that LLM developers such as Meta should have compensated YOU to  
 2 allegedly use” as irrelevant and unintelligible. Plaintiff interprets this Request as asking whether  
 3 Plaintiff believed the only remedy for Meta’s conduct is actual damages. Plaintiff responds, deny.

4 **REQUEST FOR ADMISSION NO. 21:**

5 Admit that, other than YOUR contention that LLM developers such as Meta should have  
 6 compensated YOU to allegedly use YOUR ASSERTED WORKS to train large language models, YOU  
 7 are unaware of any documentary evidence demonstrating an injury that YOU have suffered due to the  
 8 infringement alleged in the COMPLAINT.

9 **RESPONSE TO REQUEST NO. 21:**

10 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
 11 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 12 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
 13 terms “You” and “Your” as referring to Plaintiff Christopher Golden. Plaintiff objects to the phrase,  
 14 “other than YOUR contention that LLM developers such as Meta should have compensated YOU to  
 15 allegedly use” as irrelevant and unintelligible. Plaintiff responds, deny.

16 **REQUEST FOR ADMISSION NO. 22:**

17 Admit that YOU are personally unaware of any instance in which a PERSON read text  
 18 generated by any of Meta’s Llama models as a substitute for reading YOUR ASSERTED WORKS.

19 **RESPONSE TO REQUEST NO. 22:**

20 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
 21 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 22 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
 23 terms “You” and “Your” as referring to Plaintiff Christopher Golden. Plaintiff further objects to the  
 24 phrase “you are personally unaware” as unintelligible. Plaintiff, in his individual capacity, responds,  
 25 admit.

**REQUEST FOR ADMISSION NO. 23:**

Admit that YOU are personally unaware of any documentary evidence demonstrating that any PERSON has read text generated by any of Meta's Llama models as a substitute for reading YOUR ASSERTED WORKS.

**RESPONSE TO REQUEST NO. 23:**

Plaintiff objects to the defined terms "You" and "Your" as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms "You" and "Your" as referring to Plaintiff Christopher Golden. Plaintiff also objects to the term "documentary evidence" as being vague and overbroad because it is not limited to the specific claims and defenses raised in this dispute. Plaintiff further objects to the phrase "you are personally unaware" as unintelligible. Plaintiff, in his individual capacity, responds, admit.

**REQUEST FOR ADMISSION NO. 24:**

Admit that YOU are personally unaware of any text generated by any of Meta's Llama models that infringes YOUR ASSERTED WORKS.

**RESPONSE TO REQUEST NO. 24:**

Plaintiff objects to the defined terms "You" and "Your" as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms "You" and "Your" as referring to Plaintiff Christopher Golden. Plaintiff objects to the phrase "personally unaware" as unintelligible. Plaintiff, in his individual capacity, responds, admit.

**REQUEST FOR ADMISSION NO. 25:**

Admit that YOU have personally used one of Meta's Llama models.

**RESPONSE TO REQUEST NO. 25:**

Plaintiff objects to the defined terms "You" and "Your" as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the phrase "YOU have personally used" as unintelligible. Plaintiff further objects to this Request as not

1 terms "You" and "Your" as referring to Plaintiff Christopher Golden. Plaintiff further objects to the  
 2 phrase "for a fee" as vague and ambiguous. Subject to and without waiving the foregoing objections,  
 3 Plaintiff responds that after a reasonable inquiry, the information known or that can be readily obtained  
 4 by him is insufficient to enable him to admit or deny.

5  
 6 Dated: July 22, 2024

7 By: /s/ Joseph R. Saveri  
 8 Joseph R. Saveri

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15 **UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

16 Richard Kadrey, et al.,

17 *Individual and Representative Plaintiffs,*

18 v.

19 Meta Platforms, Inc.,

20 *Defendant.*

21 Lead Case No. 3:23-cv-03417-VC  
22 Case No. 4:23-cv-04663

23 **PLAINTIFF ANDREW SEAN GREER'S  
24 RESPONSES TO DEFENDANT META  
25 PLATFORMS, INC.'S SECOND SET OF  
26 REQUESTS FOR ADMISSION**

1 “other than YOUR contention that LLM developers such as Meta should have compensated YOU to  
 2 allegedly use” as irrelevant and unintelligible. Plaintiff interprets this Request as asking whether  
 3 Plaintiff believed the only remedy for Meta’s conduct is actual damages. Plaintiff responds, deny.

4 **REQUEST FOR ADMISSION NO. 21:**

5 Admit that, other than YOUR contention that LLM developers such as Meta should have  
 6 compensated YOU to allegedly use YOUR ASSERTED WORKS to train large language models, YOU  
 7 are unaware of any documentary evidence demonstrating an injury that YOU have suffered due to the  
 8 infringement alleged in the COMPLAINT.

9 **RESPONSE TO REQUEST NO. 21:**

10 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
 11 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 12 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
 13 terms “You” and “Your” as referring to Plaintiff Andrew Sean Greer. Plaintiff objects to the phrase,  
 14 “other than YOUR contention that LLM developers such as Meta should have compensated YOU to  
 15 allegedly use” as irrelevant and unintelligible. Plaintiff responds, deny.

16 **REQUEST FOR ADMISSION NO. 22:**

17 Admit that YOU are personally unaware of any instance in which a PERSON read text  
 18 generated by any of Meta’s Llama models as a substitute for reading YOUR ASSERTED WORKS.

19 **RESPONSE TO REQUEST NO. 22:**

20 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
 21 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 22 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
 23 terms “You” and “Your” as referring to Plaintiff Andrew Sean Greer. Plaintiff further objects to the  
 24 phrase “you are personally unaware” as unintelligible. Plaintiff, in him individual capacity, responds,  
 25 admit.

26 **REQUEST FOR ADMISSION NO. 23:**

1 Admit that YOU are personally unaware of any documentary evidence demonstrating that any  
 2 PERSON has read text generated by any of Meta's Llama models as a substitute for reading YOUR  
 3 ASSERTED WORKS.

4 **RESPONSE TO REQUEST NO. 23:**

5 Plaintiff objects to the defined terms "You" and "Your" as vague and overbroad and calling for  
 6 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 7 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
 8 terms "You" and "Your" as referring to Plaintiff Andrew Sean Greer. Plaintiff also objects to the term  
 9 "documentary evidence" as being vague and overbroad because it is not limited to the specific claims  
 10 and defenses raised in this dispute. Plaintiff further objects to the phrase "you are personally unaware"  
 11 as unintelligible. Plaintiff, in him individual capacity, responds, admit.

12 **REQUEST FOR ADMISSION NO. 24:**

13 Admit that YOU are personally unaware of any text generated by any of Meta's Llama models  
 14 that infringes YOUR ASSERTED WORKS.

15 **RESPONSE TO REQUEST NO. 24:**

16 Plaintiff objects to the defined terms "You" and "Your" as vague and overbroad and calling for  
 17 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 18 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
 19 terms "You" and "Your" as referring to Plaintiff Andrew Sean Greer. Plaintiff objects to the phrase  
 20 "personally unaware" as unintelligible. Plaintiff, in him individual capacity, responds, admit.

21 **REQUEST FOR ADMISSION NO. 25:**

22 Admit that YOU have personally used one of Meta's Llama models.

23 **RESPONSE TO REQUEST NO. 25:**

24 Plaintiff objects to the defined terms "You" and "Your" as vague and overbroad and calling for  
 25 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 26 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the  
 27 phrase "YOU have personally used" as unintelligible. Plaintiff further objects to this Request as not

1 terms "You" and "Your" as referring to Plaintiff Andrew Sean Greer. Plaintiff further objects to the  
 2 phrase "for a fee" as vague and ambiguous. Subject to and without waiving the foregoing objections,  
 3 Plaintiff responds that after a reasonable inquiry, the information known or that can be readily obtained  
 4 by him is insufficient to enable him to admit or deny.

5 Dated: July 22, 2024

6 By: /s/ Bryan Clobes  
 7 Bryan L. Clobes

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15 **UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

16 Richard Kadrey, et al.,

17 *Individual and Representative Plaintiffs,*

18 v.

19 Meta Platforms, Inc.,

20 *Defendant.*

21 Lead Case No. 3:23-cv-03417-VC  
22 Case No. 4:23-cv-04663

23 **PLAINTIFF DAVID HENRY HWANG'S  
24 RESPONSES TO DEFENDANT META  
25 PLATFORMS, INC.'S SECOND SET OF  
26 REQUESTS FOR ADMISSION**

1 “other than YOUR contention that LLM developers such as Meta should have compensated YOU to  
 2 allegedly use” as irrelevant and unintelligible. Plaintiff interprets this Request as asking whether  
 3 Plaintiff believed the only remedy for Meta’s conduct is actual damages. Plaintiff responds, deny.

4 **REQUEST FOR ADMISSION NO. 21:**

5 Admit that, other than YOUR contention that LLM developers such as Meta should have  
 6 compensated YOU to allegedly use YOUR ASSERTED WORKS to train large language models, YOU  
 7 are unaware of any documentary evidence demonstrating an injury that YOU have suffered due to the  
 8 infringement alleged in the COMPLAINT.

9 **RESPONSE TO REQUEST NO. 21:**

10 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
 11 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 12 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
 13 terms “You” and “Your” as referring to Plaintiff David Henry Hwang. Plaintiff objects to the phrase,  
 14 “other than YOUR contention that LLM developers such as Meta should have compensated YOU to  
 15 allegedly use” as irrelevant and unintelligible. Plaintiff responds, deny.

16 **REQUEST FOR ADMISSION NO. 22:**

17 Admit that YOU are personally unaware of any instance in which a PERSON read text  
 18 generated by any of Meta’s Llama models as a substitute for reading YOUR ASSERTED WORKS.

19 **RESPONSE TO REQUEST NO. 22:**

20 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
 21 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 22 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
 23 terms “You” and “Your” as referring to Plaintiff David Henry Hwang. Plaintiff further objects to the  
 24 phrase “you are personally unaware” as unintelligible. Plaintiff, in him individual capacity, responds,  
 25 admit.

26 **REQUEST FOR ADMISSION NO. 23:**

1 Admit that YOU are personally unaware of any documentary evidence demonstrating that any  
 2 PERSON has read text generated by any of Meta's Llama models as a substitute for reading YOUR  
 3 ASSERTED WORKS.

4 **RESPONSE TO REQUEST NO. 23:**

5 Plaintiff objects to the defined terms "You" and "Your" as vague and overbroad and calling for  
 6 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 7 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
 8 terms "You" and "Your" as referring to Plaintiff David Henry Hwang. Plaintiff also objects to the term  
 9 "documentary evidence" as being vague and overbroad because it is not limited to the specific claims  
 10 and defenses raised in this dispute. Plaintiff further objects to the phrase "you are personally unaware"  
 11 as unintelligible. Plaintiff, in him individual capacity, responds, admit.

12 **REQUEST FOR ADMISSION NO. 24:**

13 Admit that YOU are personally unaware of any text generated by any of Meta's Llama models  
 14 that infringes YOUR ASSERTED WORKS.

15 **RESPONSE TO REQUEST NO. 24:**

16 Plaintiff objects to the defined terms "You" and "Your" as vague and overbroad and calling for  
 17 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 18 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
 19 terms "You" and "Your" as referring to Plaintiff David Henry Hwang. Plaintiff objects to the phrase  
 20 "personally unaware" as unintelligible. Plaintiff, in him individual capacity, responds, admit.

21 **REQUEST FOR ADMISSION NO. 25:**

22 Admit that YOU have personally used one of Meta's Llama models.

23 **RESPONSE TO REQUEST NO. 25:**

24 Plaintiff objects to the defined terms "You" and "Your" as vague and overbroad and calling for  
 25 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 26 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the  
 27 phrase "YOU have personally used" as unintelligible. Plaintiff further objects to this Request as not

1 terms "You" and "Your" as referring to Plaintiff David Henry Hwang. Plaintiff further objects to the  
 2 phrase "for a fee" as vague and ambiguous. Subject to and without waiving the foregoing objections,  
 3 Plaintiff responds that after a reasonable inquiry, the information known or that can be readily obtained  
 4 by him is insufficient to enable him to admit or deny.

5 Dated: July 22, 2024

6 By: /s/ Bryan L. Clobes  
 7 Bryan L. Clobes

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 9 Alexander J. Sweatman (pro hac vice)  
 10 Mohammed Rathur (pro hac vice)  
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15  
 16  
 17  
**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

18 Richard Kadrey, et al.,  
 19  
 20 *Individual and Representative Plaintiffs,*  
 21  
 22 v.  
 23  
 24 Meta Platforms, Inc.,  
 25  
 26  
 27 *Defendant.*

28  
 Lead Case No. 3:23-cv-03417-VC  
 Case No. 4:23-cv-06663

**PLAINTIFF RICHARD KADREY'S  
 RESPONSES TO DEFENDANT META  
 PLATFORMS, INC.'S SECOND SET OF  
 REQUESTS FOR ADMISSION**

1 “other than YOUR contention that LLM developers such as Meta should have compensated YOU to  
 2 allegedly use” as irrelevant and unintelligible. Plaintiff interprets this Request as asking whether  
 3 Plaintiff believed the only remedy for Meta’s conduct is actual damages. Plaintiff responds, deny.

4 **REQUEST FOR ADMISSION NO. 21:**

5 Admit that, other than YOUR contention that LLM developers such as Meta should have  
 6 compensated YOU to allegedly use YOUR ASSERTED WORKS to train large language models, YOU  
 7 are unaware of any documentary evidence demonstrating an injury that YOU have suffered due to the  
 8 infringement alleged in the COMPLAINT.

9 **RESPONSE TO REQUEST NO. 21:**

10 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
 11 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 12 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
 13 terms “You” and “Your” as referring to Plaintiff Richard Kadrey. Plaintiff objects to the phrase,  
 14 “other than YOUR contention that LLM developers such as Meta should have compensated YOU to  
 15 allegedly use” as irrelevant and unintelligible. Plaintiff responds, deny.

16 **REQUEST FOR ADMISSION NO. 22:**

17 Admit that YOU are personally unaware of any instance in which a PERSON read text  
 18 generated by any of Meta’s Llama models as a substitute for reading YOUR ASSERTED WORKS.

19 **RESPONSE TO REQUEST NO. 22:**

20 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
 21 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 22 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
 23 terms “You” and “Your” as referring to Plaintiff Richard Kadrey. Plaintiff further objects to the  
 24 phrase “you are personally unaware” as unintelligible. Plaintiff, in his individual capacity, responds,  
 25 admit.

**REQUEST FOR ADMISSION NO. 23:**

Admit that YOU are personally unaware of any documentary evidence demonstrating that any PERSON has read text generated by any of Meta's Llama models as a substitute for reading YOUR ASSERTED WORKS.

**RESPONSE TO REQUEST NO. 23:**

Plaintiff objects to the defined terms "You" and "Your" as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms "You" and "Your" as referring to Plaintiff Richard Kadrey. Plaintiff also objects to the term "documentary evidence" as being vague and overbroad because it is not limited to the specific claims and defenses raised in this dispute. Plaintiff further objects to the phrase "you are personally unaware" as unintelligible. Plaintiff, in his individual capacity, responds, admit.

**REQUEST FOR ADMISSION NO. 24:**

Admit that YOU are personally unaware of any text generated by any of Meta's Llama models that infringes YOUR ASSERTED WORKS.

**RESPONSE TO REQUEST NO. 24:**

Plaintiff objects to the defined terms "You" and "Your" as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms "You" and "Your" as referring to Plaintiff Richard Kadrey. Plaintiff objects to the phrase "personally unaware" as unintelligible. Plaintiff, in his individual capacity, responds, admit.

**REQUEST FOR ADMISSION NO. 25:**

Admit that YOU have personally used one of Meta's Llama models.

**RESPONSE TO REQUEST NO. 25:**

Plaintiff objects to the defined terms "You" and "Your" as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the phrase "YOU have personally used" as unintelligible. Plaintiff further objects to this Request as not

1 terms "You" and "Your" as referring to Plaintiff Richard Kadrey. Plaintiff further objects to the  
 2 phrase "for a fee" as vague and ambiguous. Subject to and without waiving the foregoing objections,  
 3 Plaintiff responds that after a reasonable inquiry, the information known or that can be readily obtained  
 4 by him is insufficient to enable him to admit or deny.

5  
 6 Dated: July 22, 2024

7 By: /s/ Joseph R. Saveri  
 8 Joseph R. Saveri

9 Joseph R. Saveri (State Bar No. 130064)  
 10 Cadio Zirpoli (State Bar No. 179108)  
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15 **UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

16 Richard Kadrey, et al.,

17 *Individual and Representative Plaintiffs,*

18 v.

19 Meta Platforms, Inc.,

20 *Defendant.*

21 Lead Case No. 3:23-cv-03417-VC  
22 Case No. 4:23-cv-04663

23 **PLAINTIFF MATTHEW KLAM'S  
RESPONSES TO DEFENDANT META  
PLATFORMS, INC.'S SECOND SET OF  
REQUESTS FOR ADMISSION**

1 than YOUR contention that LLM developers such as Meta should have compensated YOU to allegedly  
 2 use" as irrelevant and unintelligible. Plaintiff interprets this Request as asking whether Plaintiff  
 3 believed the only remedy for Meta's conduct is actual damages. Plaintiff responds, deny.

4 **REQUEST FOR ADMISSION NO. 21:**

5 Admit that, other than YOUR contention that LLM developers such as Meta should have  
 6 compensated YOU to allegedly use YOUR ASSERTED WORKS to train large language models, YOU  
 7 are unaware of any documentary evidence demonstrating an injury that YOU have suffered due to the  
 8 infringement alleged in the COMPLAINT.

9 **RESPONSE TO REQUEST NO. 21:**

10 Plaintiff objects to the defined terms "You" and "Your" as vague and overbroad and calling for  
 11 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 12 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
 13 terms "You" and "Your" as referring to Plaintiff Matthew Klam. Plaintiff objects to the phrase, "other  
 14 than YOUR contention that LLM developers such as Meta should have compensated YOU to allegedly  
 15 use" as irrelevant and unintelligible. Plaintiff responds, deny.

16 **REQUEST FOR ADMISSION NO. 22:**

17 Admit that YOU are personally unaware of any instance in which a PERSON read text  
 18 generated by any of Meta's Llama models as a substitute for reading YOUR ASSERTED WORKS.

19 **RESPONSE TO REQUEST NO. 22:**

20 Plaintiff objects to the defined terms "You" and "Your" as vague and overbroad and calling for  
 21 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 22 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
 23 terms "You" and "Your" as referring to Plaintiff Matthew Klam. Plaintiff further objects to the phrase  
 24 "you are personally unaware" as unintelligible. Plaintiff, in his individual capacity, responds, admit.

25 **REQUEST FOR ADMISSION NO. 23:**

26 Admit that YOU are personally unaware of any documentary evidence demonstrating that any  
 27 PERSON has read text generated by any of Meta's Llama models as a substitute for reading YOUR  
 28 ASSERTED WORKS.

**1 RESPONSE TO REQUEST NO. 23:**

2 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
 3 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 4 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
 5 terms “You” and “Your” as referring to Plaintiff Matthew Klam. Plaintiff also objects to the term  
 6 “documentary evidence” as being vague and overbroad because it is not limited to the specific claims  
 7 and defenses raised in this dispute. Plaintiff further objects to the phrase “you are personally unaware”  
 8 as unintelligible. Plaintiff, in him individual capacity, responds, admit.

**9 REQUEST FOR ADMISSION NO. 24:**

10 Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models  
 11 that infringes YOUR ASSERTED WORKS.

**12 RESPONSE TO REQUEST NO. 24:**

13 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
 14 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 15 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
 16 terms “You” and “Your” as referring to Plaintiff Matthew Klam. Plaintiff objects to the phrase  
 17 “personally unaware” as unintelligible. Plaintiff, in him individual capacity, responds, admit.

**18 REQUEST FOR ADMISSION NO. 25:**

19 Admit that YOU have personally used one of Meta’s Llama models.

**20 RESPONSE TO REQUEST NO. 25:**

21 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
 22 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 23 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the  
 24 phrase “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not  
 25 relevant to any claims or defenses in this dispute since this case concerns Meta’s large language  
 26 models. Plaintiff, in him individual capacity, responds, deny.

**27 REQUEST FOR ADMISSION NO. 26:**

28 Admit that YOU have personally used one of the ChatGPT large language models.

1 Dated: July 22, 2024

2 By: /s/ Bryan L. Clobes  
3 Bryan L. Clobes

4 Bryan L. Clobes (pro hac vice)  
5 Alexander J. Sweatman (pro hac vice)  
6 Mohammed Rathur (pro hac vice)  
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3 Christopher K.L. Young (State Bar No. 318371)  
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9 *Counsel for Individual and Representative  
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15 **UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

16 Richard Kadrey, et al.,

17 *Individual and Representative Plaintiffs,*

18 v.

19 Meta Platforms, Inc.,

20 *Defendant.*

21 Lead Case No. 3:23-cv-03417-VC  
22 Case No. 4:23-cv-04663

23 **PLAINTIFF LAURA LIPPMAN'S  
RESPONSES TO DEFENDANT META  
PLATFORMS, INC.'S SECOND SET OF  
REQUESTS FOR ADMISSION**

1 than YOUR contention that LLM developers such as Meta should have compensated YOU to allegedly  
 2 use" as irrelevant and unintelligible. Plaintiff interprets this Request as asking whether Plaintiff  
 3 believed the only remedy for Meta's conduct is actual damages. Plaintiff responds, deny.

4 **REQUEST FOR ADMISSION NO. 21:**

5 Admit that, other than YOUR contention that LLM developers such as Meta should have  
 6 compensated YOU to allegedly use YOUR ASSERTED WORKS to train large language models, YOU  
 7 are unaware of any documentary evidence demonstrating an injury that YOU have suffered due to the  
 8 infringement alleged in the COMPLAINT.

9 **RESPONSE TO REQUEST NO. 21:**

10 Plaintiff objects to the defined terms "You" and "Your" as vague and overbroad and calling for  
 11 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 12 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
 13 terms "You" and "Your" as referring to Plaintiff Laura Lippman. Plaintiff objects to the phrase, "other  
 14 than YOUR contention that LLM developers such as Meta should have compensated YOU to allegedly  
 15 use" as irrelevant and unintelligible. Plaintiff responds, deny.

16 **REQUEST FOR ADMISSION NO. 22:**

17 Admit that YOU are personally unaware of any instance in which a PERSON read text  
 18 generated by any of Meta's Llama models as a substitute for reading YOUR ASSERTED WORKS.

19 **RESPONSE TO REQUEST NO. 22:**

20 Plaintiff objects to the defined terms "You" and "Your" as vague and overbroad and calling for  
 21 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 22 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
 23 terms "You" and "Your" as referring to Plaintiff Laura Lippman. Plaintiff further objects to the phrase  
 24 "you are personally unaware" as unintelligible. Plaintiff, in her individual capacity, responds, admit.

25 **REQUEST FOR ADMISSION NO. 23:**

26 Admit that YOU are personally unaware of any documentary evidence demonstrating that any  
 27 PERSON has read text generated by any of Meta's Llama models as a substitute for reading YOUR  
 28 ASSERTED WORKS.

**1 RESPONSE TO REQUEST NO. 23:**

2 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
 3 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 4 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
 5 terms “You” and “Your” as referring to Plaintiff Laura Lippman. Plaintiff also objects to the term  
 6 “documentary evidence” as being vague and overbroad because it is not limited to the specific claims  
 7 and defenses raised in this dispute. Plaintiff further objects to the phrase “you are personally unaware”  
 8 as unintelligible. Plaintiff, in her individual capacity, responds, admit.

**9 REQUEST FOR ADMISSION NO. 24:**

10 Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models  
 11 that infringes YOUR ASSERTED WORKS.

**12 RESPONSE TO REQUEST NO. 24:**

13 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
 14 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 15 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
 16 terms “You” and “Your” as referring to Plaintiff Laura Lippman. Plaintiff objects to the phrase  
 17 “personally unaware” as unintelligible. Plaintiff, in her individual capacity, responds, admit.

**18 REQUEST FOR ADMISSION NO. 25:**

19 Admit that YOU have personally used one of Meta’s Llama models.

**20 RESPONSE TO REQUEST NO. 25:**

21 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
 22 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 23 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the  
 24 phrase “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not  
 25 relevant to any claims or defenses in this dispute since this case concerns Meta’s large language  
 26 models. Plaintiff, in her individual capacity, responds, deny.

**27 REQUEST FOR ADMISSION NO. 26:**

28 Admit that YOU have personally used one of the ChatGPT large language models.

1 Dated: July 22, 2024

2 By: /s/ Bryan Clobes  
3 Bryan L. Clobes

4 Bryan L. Clobes (pro hac vice)  
5 Alexander J. Sweatman (pro hac vice)  
6 Mohammed A. Rathur (pro hac vice)  
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 3 Christopher K.L. Young (State Bar No. 318371)  
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15  
 16  
 17  
**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

18 Richard Kadrey, et al.,  
 19  
 20 *Individual and Representative Plaintiffs,*  
 21  
 22 v.  
 23  
 24 Meta Platforms, Inc.,  
 25  
 26  
 27 *Defendant.*

28  
 Lead Case No. 3:23-cv-03417-VC  
 Case No. 4:23-cv-06663

**PLAINTIFF SARAH SILVERMAN'S  
 RESPONSES TO DEFENDANT META  
 PLATFORMS, INC.'S SECOND SET OF  
 REQUESTS FOR ADMISSION**

1 “other than YOUR contention that LLM developers such as Meta should have compensated YOU to  
 2 allegedly use” as irrelevant and unintelligible. Plaintiff interprets this Request as asking whether  
 3 Plaintiff believed the only remedy for Meta’s conduct is actual damages. Plaintiff responds, deny.

4 **REQUEST FOR ADMISSION NO. 21:**

5 Admit that, other than YOUR contention that LLM developers such as Meta should have  
 6 compensated YOU to allegedly use YOUR ASSERTED WORKS to train large language models, YOU  
 7 are unaware of any documentary evidence demonstrating an injury that YOU have suffered due to the  
 8 infringement alleged in the COMPLAINT.

9 **RESPONSE TO REQUEST NO. 21:**

10 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
 11 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 12 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
 13 terms “You” and “Your” as referring to Plaintiff Sarah Silverman. Plaintiff objects to the phrase,  
 14 “other than YOUR contention that LLM developers such as Meta should have compensated YOU to  
 15 allegedly use” as irrelevant and unintelligible. Plaintiff responds, deny.

16 **REQUEST FOR ADMISSION NO. 22:**

17 Admit that YOU are personally unaware of any instance in which a PERSON read text  
 18 generated by any of Meta’s Llama models as a substitute for reading YOUR ASSERTED WORKS.

19 **RESPONSE TO REQUEST NO. 22:**

20 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
 21 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 22 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
 23 terms “You” and “Your” as referring to Plaintiff Sarah Silverman. Plaintiff further objects to the  
 24 phrase “you are personally unaware” as unintelligible. Plaintiff, in her individual capacity, responds,  
 25 admit.

**REQUEST FOR ADMISSION NO. 23:**

Admit that YOU are personally unaware of any documentary evidence demonstrating that any PERSON has read text generated by any of Meta's Llama models as a substitute for reading YOUR ASSERTED WORKS.

**RESPONSE TO REQUEST NO. 23:**

Plaintiff objects to the defined terms "You" and "Your" as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms "You" and "Your" as referring to Plaintiff Sarah Silverman. Plaintiff also objects to the term "documentary evidence" as being vague and overbroad because it is not limited to the specific claims and defenses raised in this dispute. Plaintiff further objects to the phrase "you are personally unaware" as unintelligible. Plaintiff, in her individual capacity, responds, admit.

**REQUEST FOR ADMISSION NO. 24:**

Admit that YOU are personally unaware of any text generated by any of Meta's Llama models that infringes YOUR ASSERTED WORKS.

**RESPONSE TO REQUEST NO. 24:**

Plaintiff objects to the defined terms "You" and "Your" as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms "You" and "Your" as referring to Plaintiff Sarah Silverman. Plaintiff objects to the phrase "personally unaware" as unintelligible. Plaintiff, in her individual capacity, responds, admit.

**REQUEST FOR ADMISSION NO. 25:**

Admit that YOU have personally used one of Meta's Llama models.

**RESPONSE TO REQUEST NO. 25:**

Plaintiff objects to the defined terms "You" and "Your" as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the phrase "YOU have personally used" as unintelligible. Plaintiff further objects to this Request as not

1 terms "You" and "Your" as referring to Plaintiff Sarah Silverman. Plaintiff further objects to the  
 2 phrase "for a fee" as vague and ambiguous. Subject to and without waiving the foregoing objections,  
 3 Plaintiff responds that after a reasonable inquiry, the information known or that can be readily obtained  
 4 by her is insufficient to enable her to admit or deny.

5  
 6 Dated: July 22, 2024

7 By: /s/ Joseph R. Saveri  
 8 Joseph R. Saveri

9 Joseph R. Saveri (State Bar No. 130064)  
 10 Cadio Zirpoli (State Bar No. 179108)  
 11 Christopher K.L. Young (State Bar No. 318371)  
 12 Holden Benon (State Bar No. 325847)  
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 26 Alexander J. Sweatman (*pro hac vice anticipated*)  
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14

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

15 Richard Kadrey, et al.,

16 *Individual and Representative Plaintiffs,*

17 v.

18 Meta Platforms, Inc.,

19 *Defendant.*

20

Lead Case No. 3:23-cv-03417-VC  
 Case No. 4:23-cv-04663

21

**PLAINTIFF RACHEL LOUISE SNYDER'S  
 22 RESPONSES TO DEFENDANT META  
 23 PLATFORMS, INC.'S SECOND SET OF  
 24 REQUESTS FOR ADMISSION**

1 “other than YOUR contention that LLM developers such as Meta should have compensated YOU to  
 2 allegedly use” as irrelevant and unintelligible. Plaintiff interprets this Request as asking whether  
 3 Plaintiff believed the only remedy for Meta’s conduct is actual damages. Plaintiff responds, deny.

4 **REQUEST FOR ADMISSION NO. 21:**

5 Admit that, other than YOUR contention that LLM developers such as Meta should have  
 6 compensated YOU to allegedly use YOUR ASSERTED WORKS to train large language models, YOU  
 7 are unaware of any documentary evidence demonstrating an injury that YOU have suffered due to the  
 8 infringement alleged in the COMPLAINT.

9 **RESPONSE TO REQUEST NO. 21:**

10 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
 11 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 12 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
 13 terms “You” and “Your” as referring to Plaintiff Rachel Louise Snyder. Plaintiff objects to the phrase,  
 14 “other than YOUR contention that LLM developers such as Meta should have compensated YOU to  
 15 allegedly use” as irrelevant and unintelligible. Plaintiff responds, deny.

16 **REQUEST FOR ADMISSION NO. 22:**

17 Admit that YOU are personally unaware of any instance in which a PERSON read text  
 18 generated by any of Meta’s Llama models as a substitute for reading YOUR ASSERTED WORKS.

19 **RESPONSE TO REQUEST NO. 22:**

20 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
 21 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 22 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
 23 terms “You” and “Your” as referring to Plaintiff Rachel Louise Snyder. Plaintiff further objects to the  
 24 phrase “you are personally unaware” as unintelligible. Plaintiff, in her individual capacity, responds,  
 25 admit.

26 **REQUEST FOR ADMISSION NO. 23:**

1 Admit that YOU are personally unaware of any documentary evidence demonstrating that any  
 2 PERSON has read text generated by any of Meta's Llama models as a substitute for reading YOUR  
 3 ASSERTED WORKS.

4 **RESPONSE TO REQUEST NO. 23:**

5 Plaintiff objects to the defined terms "You" and "Your" as vague and overbroad and calling for  
 6 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 7 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
 8 terms "You" and "Your" as referring to Plaintiff Rachel Louise Snyder. Plaintiff also objects to the  
 9 term "documentary evidence" as being vague and overbroad because it is not limited to the specific  
 10 claims and defenses raised in this dispute. Plaintiff further objects to the phrase "you are personally  
 11 unaware" as unintelligible. Plaintiff, in her individual capacity, responds, admit.

12 **REQUEST FOR ADMISSION NO. 24:**

13 Admit that YOU are personally unaware of any text generated by any of Meta's Llama models  
 14 that infringes YOUR ASSERTED WORKS.

15 **RESPONSE TO REQUEST NO. 24:**

16 Plaintiff objects to the defined terms "You" and "Your" as vague and overbroad and calling for  
 17 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 18 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
 19 terms "You" and "Your" as referring to Plaintiff Rachel Louise Snyder. Plaintiff objects to the phrase  
 20 "personally unaware" as unintelligible. Plaintiff, in her individual capacity, responds, admit.

21 **REQUEST FOR ADMISSION NO. 25:**

22 Admit that YOU have personally used one of Meta's Llama models.

23 **RESPONSE TO REQUEST NO. 25:**

24 Plaintiff objects to the defined terms "You" and "Your" as vague and overbroad and calling for  
 25 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 26 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the  
 27 phrase "YOU have personally used" as unintelligible. Plaintiff further objects to this Request as not

1 terms "You" and "Your" as referring to Plaintiff Rachel Louise Snyder. Plaintiff further objects to the  
 2 phrase "for a fee" as vague and ambiguous. Subject to and without waiving the foregoing objections,  
 3 Plaintiff responds that after a reasonable inquiry, the information known or that can be readily obtained  
 4 by her is insufficient to enable her to admit or deny.

5 Dated: July 22, 2024

6 By: /s/ Bryan Clobes  
 7 Bryan L. Clobes

8 Bryan L. Clobes (pro hac vice)  
 9 Alexander J. Sweatman (pro hac vice)  
 10 Mohammed Rathur (pro hac vice)  
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 25 and the Proposed Class*

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8 *Counsel for Plaintiffs and the Proposed  
 9 Class, Additional Counsel Listed Below*

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA

12 RICHARD KADREY, SARAH SILVERMAN,  
 13 CHRISTOPHER GOLDEN, TA-NEHISI  
 COATES, JUNOT DÍAZ, ANDREW SEAN  
 GREER, DAVID HENRY HWANG,  
 MATTHEW KLAM, LAURA LIPPMAN,  
 RACHEL LOUISE SNYDER, JACQUELINE  
 WOODSON, AND LYSA TERKEURST,

14 *Individual and Representative Plaintiffs,*

15 v.

16 META PLATFORMS, INC.;

17 *Defendant.*

18 Case No. 3:23-cv-03417-VC

19 **PLAINTIFF LYSA TERKEURST'S  
 20 RESPONSES AND OBJECTIONS TO  
 DEFENDANT META PLATFORMS,  
 INC.'S SECOND SET OF REQUESTS  
 FOR ADMISSION**

21 Plaintiff Lysa TerKeurst ("Plaintiff") hereby responds to Defendant Meta Platforms,  
 22 Inc.'s ("Defendant" or "Meta") Second Set of Requests for Admissions (the "Requests" or  
 23 "RFAs").

24 **GENERAL OBJECTIONS**

25 1. Plaintiff generally objects to Defendant's definitions and instructions to the extent  
 26 they purport to require Plaintiff to respond in any way beyond what is required by the Federal  
 27 and local rules.

28 2. Plaintiff objects to the Requests to the extent they seek information or materials  
 29 that are protected from disclosure by attorney-client privilege, the work-product doctrine, expert

1 have compensated YOU to allegedly use" as irrelevant and unintelligible. Subject to and without  
 2 waiving these objections, Plaintiff denies Request No. 21.

3 **REQUEST FOR ADMISSION NO. 22:**

4 Admit that YOU are personally unaware of any instance in which a PERSON read text  
 5 generated by any of Meta's Llama models as a substitute for reading YOUR ASSERTED  
 6 WORKS.

7 **RESPONSE TO REQUEST NO. 22:**

8 Plaintiff objects to the defined terms "You" and "Your" as vague and overbroad and  
 9 calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as  
 10 defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff  
 11 will construe the terms "You" and "Your" as referring to Plaintiff Lysa TerKeurst. Plaintiff  
 12 further objects to the phrase "you are personally unaware" as unintelligible. Subject to and  
 13 without waiving these objections, Plaintiff admits that she is currently personally unaware of any  
 14 instance in which a PERSON read text generated by any of Meta's Llama models as a substitute  
 15 for reading any of Plaintiff's ASSERTED WORKS but denies that Plaintiff's lack of awareness  
 16 has any bearing on whether such conduct has occurred.

17 **REQUEST FOR ADMISSION NO. 23:**

18 Admit that YOU are personally unaware of any documentary evidence demonstrating  
 19 that any PERSON has read text generated by any of Meta's Llama models as a substitute for  
 20 reading YOUR ASSERTED WORKS.

21 **RESPONSE TO REQUEST NO. 23:**

22 Plaintiff objects to the defined terms "You" and "Your" as vague and overbroad and  
 23 calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as  
 24 defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff  
 25 will construe the terms "You" and "Your" as referring to Plaintiff Lysa TerKeurst. Plaintiff also  
 26 objects to the term "documentary evidence" as being vague and overbroad because it is not

1 limited to the specific claims and defenses raised in this dispute. Plaintiff further objects to the  
 2 phrase “you are personally unaware” as unintelligible. Subject to and without waiving these  
 3 objections, Plaintiff admits that she is currently personally unaware of any documentary  
 4 evidence demonstrating that a PERSON read text generated by any of Meta’s Llama models as a  
 5 substitute for reading any of Plaintiff’s ASSERTED WORKS but denies that Plaintiff’s lack of  
 6 awareness has any bearing on whether such conduct occurred or whether documentary evidence  
 7 of such conduct exists. Plaintiff otherwise denies Request No. 23.

8

9

10 **REQUEST FOR ADMISSION NO. 24:**

11 Admit that YOU are personally unaware of any text generated by any of Meta’s Llama  
 12 models that infringes YOUR ASSERTED WORKS.

13 **RESPONSE TO REQUEST NO. 24:**

14 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and  
 15 calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as  
 16 defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff  
 17 will construe the terms “You” and “Your” as referring to Plaintiff Lysa TerKeurst. Plaintiff  
 18 objects to the phrase “personally unaware” as unintelligible. Subject to and without waiving  
 19 these objections, Plaintiff denies Request No. 24.

20 **REQUEST FOR ADMISSION NO. 25:**

21 Admit that YOU have personally used one of Meta’s Llama models.

22 **RESPONSE TO REQUEST NO. 25:**

23 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and  
 24 calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as  
 25 defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff  
 26 will construe the terms “You” and “Your” as referring to Plaintiff Lysa TerKeurst. Plaintiff

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2 Dated: August 21, 2024  
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6  
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14  
**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

15 Richard Kadrey, et al.,

16 *Individual and Representative Plaintiffs,*

17 v.

18 Meta Platforms, Inc.,

19 *Defendant.*

20  
 Lead Case No. 3:23-cv-03417-VC  
 Case No. 4:23-cv-04663

21  
**PLAINTIFF JACQUELINE WOODSON'S  
 RESPONSES TO DEFENDANT META  
 PLATFORMS, INC.'S SECOND SET OF  
 REQUESTS FOR ADMISSION**

1 “other than YOUR contention that LLM developers such as Meta should have compensated YOU to  
 2 allegedly use” as irrelevant and unintelligible. Plaintiff interprets this Request as asking whether  
 3 Plaintiff believed the only remedy for Meta’s conduct is actual damages. Plaintiff responds, deny.

4 **REQUEST FOR ADMISSION NO. 21:**

5 Admit that, other than YOUR contention that LLM developers such as Meta should have  
 6 compensated YOU to allegedly use YOUR ASSERTED WORKS to train large language models, YOU  
 7 are unaware of any documentary evidence demonstrating an injury that YOU have suffered due to the  
 8 infringement alleged in the COMPLAINT.

9 **RESPONSE TO REQUEST NO. 21:**

10 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
 11 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 12 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
 13 terms “You” and “Your” as referring to Plaintiff Jacqueline Woodson. Plaintiff objects to the phrase,  
 14 “other than YOUR contention that LLM developers such as Meta should have compensated YOU to  
 15 allegedly use” as irrelevant and unintelligible. Plaintiff responds, deny.

16 **REQUEST FOR ADMISSION NO. 22:**

17 Admit that YOU are personally unaware of any instance in which a PERSON read text  
 18 generated by any of Meta’s Llama models as a substitute for reading YOUR ASSERTED WORKS.

19 **RESPONSE TO REQUEST NO. 22:**

20 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
 21 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 22 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
 23 terms “You” and “Your” as referring to Plaintiff Jacqueline Woodson. Plaintiff further objects to the  
 24 phrase “you are personally unaware” as unintelligible. Plaintiff, in her individual capacity, responds,  
 25 admit.

26 **REQUEST FOR ADMISSION NO. 23:**

1 Admit that YOU are personally unaware of any documentary evidence demonstrating that any  
 2 PERSON has read text generated by any of Meta's Llama models as a substitute for reading YOUR  
 3 ASSERTED WORKS.

4 **RESPONSE TO REQUEST NO. 23:**

5 Plaintiff objects to the defined terms "You" and "Your" as vague and overbroad and calling for  
 6 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 7 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
 8 terms "You" and "Your" as referring to Plaintiff Jacqueline Woodson. Plaintiff also objects to the term  
 9 "documentary evidence" as being vague and overbroad because it is not limited to the specific claims  
 10 and defenses raised in this dispute. Plaintiff further objects to the phrase "you are personally unaware"  
 11 as unintelligible. Plaintiff, in her individual capacity, responds, admit.

12 **REQUEST FOR ADMISSION NO. 24:**

13 Admit that YOU are personally unaware of any text generated by any of Meta's Llama models  
 14 that infringes YOUR ASSERTED WORKS.

15 **RESPONSE TO REQUEST NO. 24:**

16 Plaintiff objects to the defined terms "You" and "Your" as vague and overbroad and calling for  
 17 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 18 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
 19 terms "You" and "Your" as referring to Plaintiff Jacqueline Woodson. Plaintiff objects to the phrase  
 20 "personally unaware" as unintelligible. Plaintiff, in her individual capacity, responds, admit.

21 **REQUEST FOR ADMISSION NO. 25:**

22 Admit that YOU have personally used one of Meta's Llama models.

23 **RESPONSE TO REQUEST NO. 25:**

24 Plaintiff objects to the defined terms "You" and "Your" as vague and overbroad and calling for  
 25 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 26 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the  
 27 phrase "YOU have personally used" as unintelligible. Plaintiff further objects to this Request as not

1 terms "You" and "Your" as referring to Plaintiff Jacqueline Woodson. Plaintiff further objects to the  
 2 phrase "for a fee" as vague and ambiguous. Subject to and without waiving the foregoing objections,  
 3 Plaintiff responds that after a reasonable inquiry, the information known or that can be readily obtained  
 4 by her is insufficient to enable her to admit or deny.

5 Dated: July 22, 2024

6 By: /s/ Bryan Clobes  
 Bryan L. Clobes

7 Bryan L. Clobes (pro hac vice)  
 8 Alexander J. Sweatman (pro hac vice)  
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